

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

EDGE CAPTURE L.L.C., and EDGE SPECIALISTS, L.L.C.,	)	
Plaintiffs,	)	Civil Action No. 09-CV-1521
v.	)	<b>JURY TRIAL DEMANDED</b>
BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., UBS AG, UBS FINANCIAL SERVICES INC., UBS SECURITIES, L.L.C., WOLVERINE TRADING, L.L.C., AND WOLVERINE EXECUTION SERVICES, L.L.C.,	)	Judge Charles R. Norgle, Sr. Magistrate Judge Denlow
Defendants.	)	

**PLAINTIFFS EDGE CAPTURE L.L.C.'S AND EDGE SPECIALISTS, L.L.C.'S  
MOTION TO COMPEL THE BARCLAYS AND UBS DEFENDANTS TO COMPLY  
WITH LOCAL PATENT RULE 2.1(b)(1)**

Edge brings this motion pursuant to Federal Rule of Civil Procedure 37 to compel Barclays Bank PLC and Barclays Capital Inc. (“Barclays”) and UBS AG, UBS Financial Services Inc. and UBS Securities, L.L.C.’s (“UBS”) (Barclays and UBS shall be collectively referred to as “Defendants”) to comply with their obligations under LPR 2.1(b)(1) and produce by July 15, 2011, documents “sufficient to show the operation and construction of all aspects or elements” of the trading systems that engaged in the trades described in the Amended Complaint. Furthermore, because Edge’s LPR 2.2 Initial Infringement Contentions are due on July 20, 2011, and are meant to take into consideration Defendants’ LPR 2.1 Initial Disclosures, Edge also respectfully requests that the Court extend the deadline for Edge to serve its LPR 2.2 Initial Infringement Contentions regarding Defendants from July 20 to fourteen (14) days after Defendants satisfy their disclosure obligations under LPR 2.1(b)(1).

Edge attempted in good faith to resolve with Defendants their LPR 2.1(b)(1) disclosure violations without success. Between June 19 and June 30, the parties exchanged numerous correspondence and participated in two telephonic meet-and-confers on the matter. Despite Edge’s best efforts, however, Defendants continue to refuse to produce documents regarding the operation and construction of the trading systems that engaged in the trades specifically described in the Amended Complaint.

Defendants leave Edge with no option but to seek relief from the Court. This Motion is based upon this Motion, the attached Notice of Motion and Memorandum of Law, the papers and pleadings on file in this action, and such other and further evidence as may subsequently be presented to the Court.

Dated: July 6, 2011

Respectfully submitted,

By: /s/ Justin R. Gaudio

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**SPECIALISTS, L.L.C.**

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on July 6, 2011, he caused a true and correct copy of **PLAINTIFFS EDGE CAPTURE L.L.C.'S AND EDGE SPECIALISTS, L.L.C.'S MOTION TO COMPEL THE BARCLAYS AND UBS DEFENDANTS TO COMPLY WITH LOCAL PATENT RULE 2.1(b)(1)** to be served on the below parties through the CM/ECF system:

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/s/ Justin R. Gaudio  
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